

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA, \*

Plaintiff, \*

v. \*

KATRINA ROBINSON, \*

Defendant. \*

Case No. 20-CR-20148 SHL/tmp

Under Seal

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**MOTION TO SEAL COMPLAINT AND AFFIDAVIT**

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COMES NOW the United States of America, by and through D. Michael Dunavant, United States Attorney, and Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, and respectfully moves that this Honorable Court enter an order sealing the complaint, along with the accompanying affidavit, in the above-styled case. In support of this motion, the United States would show the following:

1. In February 2020, agents executed search warrants at the defendant's business and primary and secondary residences. The searches generated a fairly considerable amount of media coverage because of the defendant's status as a sitting State Senator, and it is therefore anticipated that the charges in the complaint will do likewise.

2. The United States therefore requests that the complaint and affidavit be filed under seal so as not to prematurely reveal the existence of the charges to the defendant or to the public at large so that the defendant can be arrested safely and without incident. The United States will move to unseal these documents once the defendant is arrested.

3. The United States requests a partial unsealing so that copies of the complaint and affidavit can be provided to other law enforcement officers to further the investigation and execution of the arrest warrant.

**CONCLUSION**

For the foregoing reasons, the United States respectfully requests that the complaint and affidavit be sealed as set forth herein.

Respectfully submitted,

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United States Attorney

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